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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91189418
Party	Plaintiff Speed Channel, Inc.
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Submission	Stipulated/Consent Motion to Extend
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Date	07/17/2009
Attachments	2CD0636.PDF (3 pages)(70111 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Application Serial Nos.:	77476098 77497086 77476107 77478035
Filed:	May 15, 2008 June 12, 2008 May 15, 2008 May 19, 2008
Marks:	SPEEDVISION SPEEDVISION SPEEDVISION HD SPEEDVISION (and Design)
Publication Date:	November 25, 2008 (for all opposed applications)

<p style="text-align: center;">SPEED CHANNEL, INC. Opposer,</p> <p style="text-align: center;">v.</p> <p style="text-align: center;">PHOENIX 2008 LLC Applicant.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Opposition No. 91189418</p>
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**CONSENT MOTION TO EXTEND DEADLINE TO RESPOND TO DISCOVERY
AND TO AMEND SCHEDULING ORDER**

In accordance with the provisions of TBMP § 509.01(a), Opposer Speed Channel, Inc. (“Speed”) moves to extend the deadline for it to respond to Applicant Phoenix 2008 LLC’s First Set of Interrogatories and First Set of Requests of Production of Documents (collectively, “Discovery Requests”) forty-five (45) days, from July 20, 2009, through and including September 3, 2009. Speed further requests that the Board’s March 25, 2009, Scheduling Order be amended by extending all discovery and trial deadlines forty-five (45) days, all as set forth in the following table:

Event	Current Deadline	Requested Deadline
Expert Disclosures Due	October 31, 2009	December 21, 2009
Discovery Closes	November 30, 2009	January 21, 2010
Plaintiff's Pretrial Disclosures	January 14, 2010	March 7, 2010
Plaintiff's 30-day Trial Period Ends	February 28, 2010	April 21, 2010
Defendant's Pretrial Disclosures	March 15, 2010	May 6, 2010
Defendant's 30-Day Trial Period Ends	April 29, 2010	June 20, 2010
Plaintiff's Rebuttal Disclosures	May 14, 2010	July 5, 2010
Plaintiff's 15-day Rebuttal Period Ends	June 13, 2010	August 4, 2010

In support of the instant Motion, Speed avers that it has been diligently working to respond to Opposer's Discovery Requests; however, it needs more time to identify and gather the requested information and documents and prepare responses. Opposer consents to the extension.

Additionally, in view of the agreed upon extension of the discovery response deadline, the parties agreed to extend all discovery and trial deadlines forty-five (45) days, which will also permit Applicant additional time to produce documents and things responsive to Opposer's previously served written discovery.

On July 15, 2009, Applicant's counsel, Brian Hurh, Esq., consented to the relief requested in this Motion.

WHEREFORE, Opposer Speed Channel, Inc. respectfully requests that the Board grant the instant Motion on its terms and award such other relief as it deems just and appropriate.

RESPECTFULLY SUBMITTED,
Speed Channel, Inc.

Dated: July 17, 2009

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Opposer's Matter Reference No.: FEG0573OPPUS

CERTIFICATE OF SERVICE

I, Daniel E. Bruso, Esq., counsel to Opposer Speed Channel, Inc. in Opposition No: 91189418, certify that, on the 17th day of July 2009, I served a copy of the CONSENT MOTION TO EXTEND DEADLINE TO RESPOND TO DISCOVERY AND TO AMEND SCHEDULING ORDER, via first class mail, postage prepaid, upon:

Brian J. Hurh, Esq.
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/Daniel E. Bruso/
Daniel E. Bruso